

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FAIRFIELD SENTRY LIMITED, *et al.*,

Debtors in Foreign Proceedings.

Chapter 15

Case No. 10-13164 (CGM)

Jointly Administered

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC, as
assignee of Fairfield Sentry Limited,

Plaintiff,

v.

FAIRFIELD GREENWICH GROUP, FAIRFIELD
GREENWICH (BERMUDA), LIMITED, FAIRFIELD
GREENWICH ADVISORS LLC, FAIRFIELD
GREENWICH LIMITED, FAIRFIELD
INTERNATIONAL MANAGERS, INC., WALTER
NOEL, JR., JEFFREY TUCKER, ANDRÉS
PIEDRAHITA, AMIT VIJAYVERGIYA, PHILIP
TOUB, and CORINA NOEL PIEDRAHITA,

Defendants.

Adv. Pro. No. 10-03800 (CGM)

FAIRFIELD GREENWICH (BERMUDA), LIMITED,

Third-Party Plaintiff,

v.

FAIRFIELD SENTRY LIMITED (IN LIQUIDATION),

Third-Party Defendant.

**STIPULATION AND ORDER EXTENDING DEFENDANTS' TIME TO ANSWER
THE SECOND AMENDED COMPLAINT AND SCHEDULING
THE PARTIES' RULE 26(f) CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel
for the parties in the above-captioned action, as follows:

1. The time for all Defendants to answer the Second Amended Complaint is extended to and including May 6, 2021.

2. On or before June 4, 2021, the Parties shall meet and confer regarding disclosures, the preservation of discoverable information and a proposed discovery plan, pursuant to Rule 26(f) of the Federal Rules of Civil Procedure.

3. To the extent defendant Andres Piedrahita maintains an affirmative defense that the Bankruptcy Court lacks personal jurisdiction over him, the Trustee shall conduct discovery as to general jurisdiction as part of the discovery in this case.

4. The above deadlines granted by this Stipulation are without prejudice to any future extensions of time.

5. By agreeing to this stipulation, the parties do not waive, and expressly preserve any and all defenses, claims, and arguments they may have.

Date: New York, New York
April 6, 2021

/s/ David J. Sheehan

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SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the estate of
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SO ORDERED:

Dated: April 8, 2021
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge